## U.S. Illnesses and Deaths Associated With Compounded or Repackaged Medications, 2001-17

Update note: This chart was updated in March 2018 to include newly reported adverse events, and newly reported details of previously included adverse events. The updated chart also replaced the term "pharmacy" with "compounder," to reflect the fact that drugs can be compounded by physicians and outsourcing facilities in addition to pharmacies.

Pew's drug safety project has identified more than 71 reported compounding errors or potential errors associated with 1,416 adverse events, including 115 deaths, from 2001 to 2017. However, a 2015 survey found that only 30 percent of states (13 of the 43 that responded) require sterile compounding pharmacies to report serious adverse events.<sup>1</sup> Of the states that require reporting, the type of information that is required to be reported may vary, further contributing to an incomplete picture of adverse events associated with compounded medications. Even in states with strong adverse event reporting requirements, illnesses and deaths caused by compounded drugs are not always linked to the compounding error.<sup>2,3,4</sup> Because many such events may go unreported, this chart is likely an underestimation of the number of compounding errors since 2001. Contamination of sterile products was the most common error; others were the result of pharmacists' and technicians' miscalculations and mistakes in filling prescriptions.

Drug compounding can be an interstate operation; pharmacies may prepare medicines in one state and ship them to another. States may encounter oversight challenges if an out-of-state pharmacy shipping into their jurisdiction is held to a different quality or regulatory standard than in-state compounders. As a result, for each row below, the state where the compounding error or potential error occurred and the state(s) where the adverse event(s) occurred are listed. Harmonized minimum quality standards for anyone who compounds drugs in any setting across states would help address challenges in regulating out-of-state pharmacies and ensure that all compounding meets strong baseline criteria for preparing safe drugs and protecting patients.

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2017	2		Tissue erosion at injection site	High pH; no glutamine detected in samples <sup>5</sup>	Compounded injectable of glutamine, arginine, and carnitine (GAC)	FL	Not reported	
2017	16		Hemorrhagic occlusive retinal vasculitis (HORV)	Not reported	Intraocular injectable of triamcinolone, moxifloxacin, and vancomycin (TMV)	NJ	Not reported	

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2017	41		Septic arthritis	Bacterial contamination <sup>7</sup>	Unknown injectable	NJ	NJ	Investigation revealed inappropriate use and handling of pharmacy bulk packaged products.
2017	1		Paralysis (partial: face)	Not reported <sup>8</sup>	Compounded injectable	ТХ	ТХ	
2017	2	1	One case of cardiac arrest; both experienced immediate hypersensitivity reactions	Product contained ungraded PEG 40 castor oil <sup>9</sup>	Injectable curcumin emulsion infusion	CA	Not reported	
2017	At least 43 <sup>10</sup>		Vision impairment, poor night vision, loss of color perception, photophobia, ocular discomfort, nausea, loss of balance, and other symptoms	Unknown <sup>11</sup>	Injectable steroid antibiotic for administration in the eye	ТХ	ТХ	
2016	6 <sup>12</sup>	1	Septic arthritis	Contamination	Viscosupplementation knee injectable	Not reported	SC	
2016	1		Abscesses and osteomyelitis	Contamination <sup>13</sup>	Unknown injectable		NM	Investigation revealed unsafe injection and compounding practices.
2016	7		Thyrotoxicosis <sup>14</sup>	Super-potent compounded drug	Compounded oral liothyronine	SD	Not reported	

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2016	17	2 <sup>15</sup>	Fungal bloodstream infections	Contamination <sup>16</sup>	Injectable saline, heparin, vancomycin, and ceftazidime	NY	NY	IV flush solutions were not compounded under quality standards set by the United States Pharmacopeial Convention and were used past appropriate beyond-use dating. The two deaths occurred within 12 weeks of the fungal infection, but it is unclear whether the deaths were a result of the infections.
2016 <sup>17</sup>	1		Overdose	Dose of manganese chloride 1,000 times stronger than usual dose <sup>18</sup>	Injectable manganese chloride	Not reported	Not reported	High manganese dose of 800 mg, compared with usual dose of 0.15-0.8 mg/day. Patient showed no resulting symptoms, but manganese overdose can result in side effects on the nerves and brain.
2016	3		Unspecified serious adverse events	Dose of morphine sulfate stronger than labeled concentration <sup>19</sup>	Injectable morphine sulfate	IN	IL, IN <sup>20</sup>	
2015	5		Redness, swelling, and pain at injection site <sup>21</sup>	Contamination	Compounded betamethasone phosphate and betamethasone acetate	AL	Not reported	
2015	"Several" <sup>22</sup>		Unspecified	High dose of vitamin ${\sf D_3^{23}}$	Oral multivitamin capsule	FL	Nationwide <sup>24</sup>	High vitamin $D_3$ can cause significant short- and long-term effects.
2014-15	7		Hepatitis C	Contamination <sup>25</sup>	Unknown injectable	CA	CA	Investigation into the clinic revealed infection control breaches and ongoing issues with infection control practices.
2014-15	"Several" <sup>26</sup>		Unspecified	Contamination <sup>27</sup>	Sterile products	AL	Nationwide <sup>28</sup>	Administration of contaminated sterile products may result in serious and potentially life- threatening infections or death.

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2014	"Several" <sup>29</sup>		Toxicity	Adulterated and misbranded drug (contained different API)	L-Citrulline	NY	Not reported	Samples of the product were found to contain a different amino acid (N-Acetyl-Leucine) than what the label claimed.
2014	1	1	Toxicity <sup>30</sup>	Not reported	Compounded topical anesthetic cream (ketamine)	ТХ	TX	
2014	At least 37 <sup>31</sup>		Not reported	Contamination	Intravitreal injections of bevacizumab or ranibizumab	FL	Not reported	Bevacizumab and ranibizumab were repackaged in a manner that exposed sterile, preservative free vials to an uncontrolled environment.
2014	1		Severe flushing, stinging, and dizziness <sup>32</sup>	Dose of magnesium sulfate 200 percent stronger than labeled concentration <sup>33</sup>	Compounded magnesium sulfate injectable	ТХ	Not reported	
2014	Unknown		Oversedation	Dose of midazolam labeled with incorrect concentration <sup>34</sup>	Injectable midazolam	IN	Not reported	Compounded midazolam, a sedating agent, did not match the concentration on the product label. Oversedation can result in a range of effects from increased sleepiness to severe difficulty breathing.
2013	1		Bacterial bloodstream infection	Contamination <sup>35</sup>	Injectable mineral product	ТХ	CA	Voluntary recall of injectable mineral product that contained bacteria with the potential for serious infection. A patient was admitted to the hospital with an infection of the same bacteria.
2013	15	2 <sup>36</sup>	Bacterial bloodstream infection	Contamination <sup>37, 38,39</sup>	Injectable calcium gluconate	ТХ	ТХ	The Centers for Disease Control and Prevention has not conclusively linked the deaths to the contaminated drug.

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2013	6		Fever, flu-like symptoms, soreness at injection site	Unknown <sup>40,41</sup>	Injectable methylcobalamin	TX	Not reported	A compounded injection was recalled due to complaints of fever, flu-like symptoms, and soreness at the injection site. Subsequent Food and Drug Administration inspection found that sterility and quality of the manufacturing process could not be assured.
2013	5		Serious bacterial eye infections	Contamination <sup>42, 43,44</sup>	Injectable bevacizumab for administration in the eye	GA	IN	
2013 <sup>45</sup>	8		Fungal eye infections	Contamination <sup>46</sup>	Injectable bevacizumab- triamcinolone for administration in the eye	Not reported	NY	Fungal infection of the eye caused significant visual impairment that persisted for at least three months from the incident.
201347	1		Kidney failure and acute injury of the liver and pancreas	Unknown <sup>48</sup>	Injectable combination product for administration under the skin	Not reported	Not reported	Product is marketed for dissolving fat. The patient developed difficulties with digestion and metabolism as well as kidney failure, which required dialysis.
2012-13	12		Bacterial bloodstream infection	Contamination <sup>49</sup>	Parenteral infusion	Not reported	IL	Facility inspection revealed deficiencies in the parenteral medication preparation and handling.
2012-13	778 <sup>50</sup>	76	Fungal meningitis and other infections	Contamination <sup>51,52</sup>	Injectable preservative- free methylprednisolone acetate	MA	FL, GA, ID, IL, IN, MD, MI, MN, NC, NH, NJ, NY, OH, PA, RI, SC, TN, TX, VA, WV	Additional products (betamethasone, cardioplegia, and triamcinolone solutions) produced at the facility were also found to be contaminated, but adverse events linked to these products have not been reported. <sup>53</sup>
2012-13	26		Bacterial and fungal infections in skin and soft tissue	Contamination <sup>54</sup>	Injectable preservative- free methylprednisolone acetate	TN	AR, FL, IL, NC	Skin and soft tissue infections resulted after intramuscular injection of preservative-free product. Subsequent voluntary recall of sterile products was issued.

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2012	47		Fungal eye infection; vision loss in majority of cases	Contamination <sup>55</sup>	Injectable brilliant blue-G (BBG) retinal dye and triamcinolone for administration in the eye	FL	CA, CO, IL, IN, LA, NC, NV, NY, TX	
2012	7		Bacterial bloodstream infection	Contamination <sup>56</sup>	Injectable fentanyl	NC	NC	
2012⁵ <sup>7</sup>	1		Overdose	Dose of flecainide four times stronger than ordered <sup>58</sup>	Oral flecainide liquid	Not reported	Not reported	Flecainide toxicity can cause abnormal heart rate and rhythms that can be severe and life- threatening, as well as increased liver enzymes, which can be an indicator of liver injury.
2012	10	1	Bacterial bloodstream infection	Contamination <sup>59</sup>	Contrast dye, anesthetic and steroid injections, single-dose vials	Not reported	AZ, DE	The outpatient pain clinic failed to follow Standard Precautions <sup>60</sup> by using single-dose vials as multi- dose vials.
2011-12	15		Bacterial bloodstream infection	Contamination <sup>61</sup>	Saline flush	Not reported	WV	Adverse events resulted from the use of bulk saline bag for IV flushes in a physician office practice.
2011 <sup>62</sup>	1		Toxicity	Dose of 4-aminopyridine 10 times stronger than labeled concentration <sup>63</sup>	Oral 4-aminopyridine pills	Not reported	Not reported	Patient experienced stomach pain, anxiety, extreme sweating, and slow heart rate prior to developing life-threatening seizures. Following a complicated hospital stay, the patient sustained permanent short-term memory loss.
201164	9		Bacterial eye infection, and one case of meningitis and encephalitis; four cases of loss of eyesight	Contamination <sup>65</sup>	Injectable bevacizumab for administration in the eye	Not reported	TN	

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2011	12		Bacterial eye infection; three patients had eye removals	Contamination <sup>66</sup>	Injectable bevacizumab for administration in the eye	FL	FL	
2011	5		Blindness	Unintended presence of another medication <sup>67</sup>	Injectable bevacizumab for administration in the eye	CA	CA	Trace amounts of bortezomib, a cancer drug that is not intended for injection into the eye, were detected on a sample syringe.
2011	19	9	Bacterial bloodstream infection	Contamination <sup>68</sup>	Parenteral nutrition solution	Not reported	AL	
2010	1	1	Fatal overdose	Dose of sodium 60 times stronger than ordered <sup>69</sup>	Injectable sodium chloride	IL	IL	Acute sodium overload can cause symptoms ranging from fluid retention to seizures and coma, affecting multiple organs including lungs and kidneys. The patient was exposed to a potent sodium- containing fluid that was entered incorrectly during the preparation of the medication, resulting in death.
2010	1		Unspecified side effects	Dose of liothyronine 10 times stronger than ordered <sup>70</sup>	Oral liothyronine (T3)	AZ	AZ	Liothyronine overdose can result in shakiness, increased heart rate, and palpitations.
2009	1	1	Fatality	Unknown <sup>71</sup>	Injectable hydromorphone	TN	Not reported	
2009	1	1	Fatal overdose	Dose of levothyroxine 18 times stronger than ordered <sup>72</sup>	Oral levothyroxine pills	NC	NC	
2009	9		Eye infection; at least one case of vision loss	Unknown <sup>73</sup>	Injectable preservative- free hyaluronidase for administration in the eye	FL	Not reported	Patients developed orbital cellulitis, a type of infection that results in inflammation of the eye.
200874	1		Acute withdrawal	Dose of baclofen 7 percent of ordered dosage <sup>75</sup>	Injectable baclofen for administration in the spine	Not reported	Not reported	The product included a fraction of the intended dose of baclofen. Patient experienced frequent and severe spasms.

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2008	1	1	Fatal overdose	Dose of sodium chloride 10 times stronger than ordered <sup>76</sup>	Injectable sodium chloride	NC	NC	Acute sodium overload can cause symptoms ranging from fluid retention to seizures and coma, and affect multiple organs including lungs and kidneys.
200877	1		Persistent inflammatory reaction	Unknown <sup>78</sup>	Mesotherapy injections	Not reported	со	Seven months after receiving mesotherapy injections, patient developed a persistent immune- mediated inflammatory reaction.
2007 <sup>79</sup>	1	1	Fatal acute respiratory distress syndrome	Colistimethate sodium left in solution longer than recommended <sup>80</sup>	Colistimethate sodium inhaled solution	Not reported	Not reported	The prodrug of colistin is better tolerated than the active drug to which it converts. More than half of the prodrug is converted within two days in solution at a certain temperature. This premixed product was in solution for five weeks before further dilution for administration.
2007	3	3	Fatal overdose	Dose of colchicine eight times stronger than labeled concentration <sup>81</sup>	Injectable colchicine	ТХ	OR, WA	IV doses that exceed the standard single-use therapeutic dose of 2-4 mg per episode of gout have resulted in life-threatening toxicity. In this case, the doses were eightfold these limits.
2007	8	1	Bacterial bloodstream infection	Contamination <sup>82</sup>	Injectable fentanyl	Not reported	CA, MD	
2006	1		Decreased consciousness, low blood pressure, and lack of oxygen	Mislabeled product leading to administration of different drug than ordered <sup>83</sup>	Epidural morphine sulfate (fentanyl/bupivacaine was ordered)	MS	AZ	Both fentanyl and morphine are in the same class of sedative analgesics. The symptoms of decreased consciousness, hypoxia, and hypotension are consistent with higher than intended opioid exposure.

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2006	At least 70		Redness, swelling, bruising, rash, fever, and cellulitis	Betamethasone made with incorrect amount of preservative <sup>84,85</sup>	Injectable betamethasone	AL	Not reported	The product was voluntarily recalled, and a subsequent reformulation continued to include an incorrect amount of preservative. An FDA investigation discovered at least 70 complaints associated with the drug.
2006	1	1	Fatal overdose	Dose of chemotherapy infusion diluted with toxic amount of sodium chloride <sup>86</sup>	Chemotherapy infusion	ОН	ОН	Acute sodium overload can cause symptoms ranging from fluid retention to seizures and coma, and affect multiple organs including lungs and kidneys.
2006	1	1	Fatal overdose	Dose of zinc 1,000 times stronger than ordered <sup>87</sup>	Neonatal parenteral nutrition solution	NV	NV	The dose was incorrectly entered for pharmacy preparation as milligrams instead of micrograms, resulting in a thousandfold overdose.
2005	3	1	Fatal overdose, cardiac arrest	Dose of lidocaine and tetracaine higher than usual <sup>88,89</sup>	Topical combination anesthetic creams (lidocaine and tetracaine)	NC	NC	
2005	19	1	Bacterial bloodstream infection	Contamination <sup>90,91</sup>	Injectable magnesium sulfate	ТХ	CA, MA, NC, NJ, NY, SD	
2004-06	80		Bacterial bloodstream infection	Contamination <sup>92</sup>	Injectable heparinized saline	ТХ	MI, MO, NY, SD, TX, WY	

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2004-05	6		Bacterial eye infection; all cases had partial or complete loss of vision; two patients had eye removals	Contamination <sup>93</sup>	Trypan blue eye drops	Not reported	Not reported	
2004-05	11	3	Systemic inflammatory response syndrome	Contamination <sup>94,95</sup>	Cardioplegia solution for administration during heart surgery	MD	VA	
2004	2		Bacterial bloodstream infection	Contamination <sup>96</sup>	Injectable heparin- vancomycin	FL	СТ	
2003	2		Overdose	Dose of liothyronine stronger than ordered <sup>97</sup>	Oral liothyronine (T3) pills	AZ	AZ	Unused pills of both patients were analyzed, and the concentration of the active ingredient was found to be 800 and 900 times higher than intended. High T3 levels can result in shakiness, increased heart rate, and palpitations.
2002-04	1	1	Fatal overdose	Dose of lidocaine and tetracaine higher than usual <sup>98,99</sup>	Topical combination anesthetic cream (lidocaine and tetracaine)	UT	AZ	
2002 <sup>100</sup>	1		Toxicity	Dose of clonidine 10 times higher than ordered <sup>101</sup>	Oral clonidine capsules	Not reported	Not reported	Patient showed early signs of central nervous system depression (such as drowsiness) and miosis (constricted or small pupils).

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2002 <sup>102</sup>	1		Toxicity	Dose of clonidine 87 times higher than ordered <sup>103</sup>	Oral clonidine liquid	Not reported	Not reported	Patient showed signs of central nervous system depression, consistent with severe clonidine toxicity. Miosis (constricted or small pupils) was also noted.
2002	2		Meningitis	Contamination <sup>104</sup>	Injectable methylprednisolone for administration in the spine	MI	MI	
2002	7	2	Fungal meningitis and sacroiliitis	Contamination <sup>105,106,107</sup>	Injectable methylprednisolone acetate for administration in the spine	SC	NC	
2001	2		Bacterial bloodstream infection	Contamination <sup>108</sup>	Injectable preservative- free heparinized saline	Not reported	Not reported	
2001 <sup>109</sup>	1		Overdose	Dose of clonidine 1,000 times stronger than ordered <sup>110</sup>	Oral clonidine liquid	Not reported	Not reported	During preparation of liquid clonidine from solid pills, milligrams were substituted for micrograms, resulting in a thousandfold overdose. Patient's initial presentation included hyperventilation, an unusual feature of clonidine toxicity. Severe clonidine toxicity can result in low blood pressure, central nervous system depression (lethargy, mental status changes), and cardiopulmonary instability (heart and breathing problems).

Year	Reported cases	Reported deaths	Adverse events	Compounding error	Product	State where compounding occurred	State where adverse event(s) occurred	Notes
2001	13	3	Five cases of meningitis; five cases of epidural abscess; one patient had an infected hip joint; two unspecified	Contamination <sup>111,112</sup>	Injectable betamethasone for administration in spine or joint	CA	CA	
2001	4		Bacterial bloodstream infection	Contamination <sup>113</sup>	Injectable ranitidine	Not reported	Not reported	
Total	1,416	115						

This chart includes U.S. illnesses and deaths associated with compounded or repackaged medications from 2001 to 2017. Adverse events were drawn from FDA and CDC resources as well as journal and news articles. In the total, "several" reported cases were counted as two adverse events, and an "unknown" number of reported cases were counted as zero adverse events.

© 2018 The Pew Charitable Trusts

## Endnotes

- The Pew Charitable Trusts, "National Assessment of State Oversight of Sterile Drug Compounding" (2016), http://www.pewtrusts.org/~/media/assets/2016/02/national\_assessment\_of\_state\_ oversight\_of\_sterile\_drug\_compounding.pdf.
- 2. Allan Coukell, "Risks of Compounded Drugs," JAMA Internal Medicine 174, no. 4 (2014): 613–14, http://jamanetwork.com/journals/jamainternalmedicine/fullarticle/1819570.
- 3. Mariya F. Farooqi et al., "Toxicity From a Clonidine Suspension," *Journal of Medical Toxicology* 5, no. 3 (2009): 130–33, https://link.springer.com/article/10.1007%2FBF03161223.
- Rebekah W. Moehring et al., "Outbreak of Bacteremia due to *Burkholderia contaminans* Linked to Intravenous Fentanyl From an Institutional Compounding Pharmacy," *JAMA Internal Medicine* 174, no. 4 (2014): 606–12, http://dx.doi.org/10.1001/jamainternmed.2013.13768.
- U.S. Food and Drug Administration, "FDA Investigates Two Adverse Events Associated With United Pharmacy's Compounded Glutamine, Arginine, and Carnitine Product for Injection," accessed Nov. 14, 2017, https://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/ PharmacyCompounding/ucm584125.htm.

- U.S. Food and Drug Administration, "A Case of Hemorrhagic Occlusive Retinal Vasculitis (HORV) Following Intraocular Injections of a Compounded Triamcinolone, Moxifloxacin, and Vancomycin Formulation," accessed Nov. 14, 2017, https://www.fda.gov/Drugs/ GuidanceComplianceRegulatoryInformation/PharmacyCompounding/ucm578514.htm.
- Kathleen Ross et al., "Outbreak of Septic Arthritis Associated With Intra-Articular Injections at an Outpatient Practice — New Jersey, 2017," *Morbidity and Mortality Weekly Report* 66, no. 29 (2017): 777-779, http://dx.doi.org/10.15585/mmwr.mm6629a3.
- 8. News Channel 10, "Amarillo Woman Claims Local Pharmacy Paralyzed Her Face," July 21, 2017, http://www.newschannel10.com/story/35944346/amarillo-woman-claims-local-pharmacyimproperly-mixed-her-prescriptions.
- U.S. Food and Drug Administration, "Compounded Curcumin Emulsion Product for Injection by ImprimisRx: FDA Investigation - Serious Adverse Events Associated With Use," accessed Nov. 14, 2017, https://www.fda.gov/Safety/MedWatch/SafetyInformation/ SafetyAlertsforHumanMedicalProducts/ucm570044.htm.

- U.S. Food and Drug Administration, "Compounded Triamicinolone and Moxifloxacin Product for Intravitreal Injection by Guardian Pharmacy Services: Alert to Health Professionals - Serious Adverse Events Reported," accessed Feb. 7, 2018, https://www.fda.gov/Safety/MedWatch/ SafetyInformation/SafetyAlertsforHumanMedicalProducts/ucm569123.htm.
- Claire Ballor, "Patients Lose Vision After Routine Cataract Surgeries at Dallas Key-Whitman Center," Dallas News, April 28, 2017, https://www.dallasnews.com/business/health-care/2017/04/27/ patients-lose-vision-routine-cataract-surgeries-dallas-key-whitman-center.
- Patricia Kopp et al., "Septic Arthritis Outbreak Following Fluoroscopy Guided Viscosupplementation Injections," (poster presented at the annual conference for the Society for Healthcare Epidemiology of America, St. Louis, March 29-31, 2017).
- Holly R. Simpson et al., "When Ignorance Is Not Bliss: Complications Associated With Homeopathic Injections From a Chiropractor," (paper presented at the annual conference for the Council of State and Territorial Epidemiologists, Boise, June 4-8, 2017).
- Janet Woodcock and Julie Dohm, "Toward Better-Quality Compounded Drugs An Update from the FDA," *The New England Journal of Medicine* 377, no. 26 (2017): 2509-2512, http://dx.doi.org/10.1056/ NEJMp1712905.
- 15. The source explicitly states that it is unclear whether the reported deaths were related to the compounding error or potential error.
- Amber M. Vasquez et al., "Notes From the Field: Fungal Bloodstream Infections Associated With a Compounded Intravenous Medication at an Outpatient Oncology Clinic—New York City, 2016," *Morbidity and Mortality Weekly Report* 65, no. 45 (2016): 1274-75, http://www.cdc.gov/mmwr/ volumes/65/wr/mm6545a6.htm?s\_cid=mm6545a6\_w.
- 17. The year source was published; information was not available about the timing of the adverse event.
- Elizabeth Hines et al., "Massive Intravenous Manganese Overdose due to Compounding Error: Minimal Role for Hemodialysis," *Clinical Toxicology* 54, no. 6 (2016): 523–25, doi:10.1080/15563650. 2016.1178390.
- U.S. Food and Drug Administration, "FDA announces Pharmakon Pharmaceuticals voluntary recall of morphine sulfate 0.5 mg/mL preservative free in 0.9% sodium chloride," last updated Feb. 16, 2016, https://www.fda.gov/Drugs/DrugSafety/ucm486400.htm.
- 20. The drug product was distributed to Illinois and Indiana; information was not available about where adverse events occurred.
- 21. Woodcock and Dohm, "Toward Better Quality Compounded Drugs."
- 22. The source explicitly states that the adverse events were potentially associated with the compounded drug product in question.
- U.S. Food and Drug Administration, "FDA Announces Glades Drugs' Nationwide Voluntary Recall of Compounded Multivitamins Containing High Amounts of Vitamin D<sub>3</sub> (Cholecalciferol)," accessed Feb. 17, 2017, http://www.fda.gov/drugs/drugsafety/ucm474552.htm.
- 24. The drug product was distributed nationally; information was not available about where adverse events occurred.

- 25. Monique A. Foster et al., "Notes From the Field: Investigation of Hepatitis C Virus Transmission Associated With Injection Therapy for Chronic Pain — California, 2015," *Morbidity and Mortality Weekly Report* 65, no. 21 (2016): 547-549, http://dx.doi.org/10.15585/mmwr/mm6521a4.
- 26. The source explicitly states that the adverse events were potentially associated with the compounded drug product in question.
- 27. U.S. Food and Drug Administration, "FDA Announces Medistat RX's Nationwide Voluntary Recall of Sterile Drug Products," last modified Sept. 9, 2015, https://www.fda.gov/Drugs/DrugSafety/ucm461810.htm.
- 28. The drug product was distributed nationally; information was not available about where adverse events occurred.
- 29. U.S. Food and Drug Administration, "Medisca Inc 11/25/15," accessed Jan. 8, 2018, https://www.fda. gov/ICECI/EnforcementActions/WarningLetters/2015/ucm474892.htm.
- 30. Kevin Krause, "Potent Pain Creams That Sold for Up to \$28K Caused Deaths, Cost Government Millions," *Dallas News*, Nov. 12, 2017, https://www.dallasnews.com/news/crime/2017/11/12/potent-pain-creams-sold-25k-caused-deaths-cost-government-millions.
- 31. U.S. Food and Drug Administration, "Eastern Pharmacy Inc. 10/29/14," accessed Jan. 8, 2018, https://www.fda.gov/ICECI/EnforcementActions/WarningLetters/ucm423249.htm.
- 32. Woodcock and Dohm, "Toward Better Quality Compounded Drugs."
- 33. U.S. Food and Drug Administration, "Walgreens Infusion Services 8/27/15," accessed Jan. 8, 2018, https://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2015/ucm473497.htm.
- 34. U.S. Food and Drug Administration, "Pharmakon Pharmaceuticals 5/21/15," accessed Dec. 12, 2016, http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2015/ucm448642.htm.
- U.S. Food and Drug Administration, "FDA Announces Voluntary Nationwide Recall of All Nonexpired Sterile Drugs From Abrams Royal Compounding Pharmacy," news release, Dec. 21, 2013.
- 36. The source explicitly states that it is unclear whether the reported deaths were related to the compounding error or potential error.
- 37. U.S. Food and Drug Administration, "Specialty Compounding Sterile Products: FDA Alert—Bacterial Infections," accessed Aug. 18, 2014.
- United States v. Specialty Compounding LLC and Raymond L. Solano and William L. Swail, "Complaint for Permanent Injunction," Case 1:15-cv-00148-LY (United States District Court for the Western District of Texas. Feb. 23, 2015).
- Centers for Disease Control and Prevention, "Nationwide Voluntary Recall of All Products for Sterile Use From Compounding Pharmacy Located in Cedar Park, Texas," accessed Jan. 30, 2017.
- 40. U.S. Food and Drug Administration, "All Sterile Drug Products Made and Distributed by NuVision Pharmacy Dallas Facility: Recall—Lack of Sterility Assurance," accessed Aug. 19, 2015.
- U.S. Food and Drug Administration, "NuVision Pharmacy 483 Report," accessed Aug. 18, 2015, http:// www.fda.gov/downloads/AboutFDA/CentersOffices/OfficeofGlobalRegulatoryOperationsandPolicy/ ORA/ORAElectronicReadingRoom/UCM348772.pdf.

- 42. Janet Woodcock (director, Center for Drug Evaluation and Research, U.S. Food and Drug Administration), statement before the U.S. Senate Committee on Health, Education, Labor, and Pensions, "Pharmaceutical Compounding: Proposed Legislative Solution" (May 9, 2013), http://www. help.senate.gov/imo/media/doc/Woodcock2.pdf.
- 43. U.S. Food and Drug Administration, "Clinical Specialties Compounding Pharmacy Products: Recall— All Sterile Products Recalled due to Lack of Sterility Assurance," accessed Aug. 13, 2013.
- 44. Laura S. Edison et al., "Endophthalmitis Outbreak Associated With Repackaged Bevacizumab," Emerging Infectious Diseases 21, no. 1 (2015): 171–73, doi:10.3201/eid2101.141040.
- 45. The year source was published; information was not available about the timing of adverse events.
- Alan T. Sheyman et al., "An Outbreak of Fungal Endophthalmitis After Intravitreal Injection of Compounded Combined Bevacizumab and Triamcinolone," JAMA Ophthalmology 131, no. 7 (2013): 864-69, doi:10.1001/jamaophthalmol.2013.88.
- 47. The year source was published; information was not available about the timing of the adverse event.
- 48. Brandon Libby et al., "Multisystem Organ Failure Following LipoDissolve Injections," *Journal of Clinical Toxicology* 3, no. 4 (2013): 171, doi:10.4172/2161-0495.1000171.
- 49. Brian R. Yablon et al., "Outbreak of *Pantoea agglomerans* Bloodstream Infections at an Oncology Clinic-Illinois, 2012-2013," *Infection Control & Hospital Epidemiology* 38, no. 3 (2017): 314-319, http://dx.doi.org/10.1017/ice.2016.265.
- Walter F. Roche, "Meningitis Outbreak Trial: Potentially Deadly Bacteria Found in NECC Drugs," USA Today Network, Oct. 12, 2017, https://www.tennessean.com/story/news/2017/10/12/meningitis-trialnew-england-compounding-center/759459001/.
- 51. Centers for Disease Control and Prevention, "Multistate Outbreak of Fungal Meningitis and Other Infections—Case Count," accessed Dec. 21, 2016, http://www.cdc.gov/hai/outbreaks/meningitis-map-large.html.
- 52. Centers for Disease Control and Prevention, "Multistate Outbreak of Fungal Meningitis and Other Infections," accessed Dec. 21, 2016, http://www.cdc.gov/HAI/outbreaks/meningitis.html.
- U.S. Food and Drug Administration, "Multistate Outbreak of Fungal Meningitis and Other Infections – Archive of Updates," accessed May 1, 2017, https://www.fda.gov/Drugs/DrugSafety/ FungalMeningitis/default.htm.
- 54. Centers for Disease Control and Prevention, "Multistate Investigation of Suspected Infections Following Steroid Injections," accessed Aug. 15, 2013, https://www.cdc.gov/hai/outbreaks/tnpharmacy/index.html.
- 55. Christina A. Mikosz et al., "Fungal Endophthalmitis Associated With Compounded Products," *Emerging Infectious Diseases* 20, no. 2 (2014): 248–56, doi:10.3201/eid2002.131257.
- 56. Moehring et al., "Outbreak of Bacteremia."
- 57. The year source was published; information was not available about the timing of the adverse event.
- 58. George Wang et al., "Flecainide Toxicity in a Pediatric Patient due to Differences in Pharmacy Compounding," *International Journal of Cardiology* 161, no. 3 (2012): 178–79, doi:10.1016/j. ijcard.2012.06.028.

- 59. Centers for Disease Control and Prevention, "Invasive *Staphylococcus aureus* Infections Associated with Pain Injections and Reuse of Single-Dose Vials Arizona and Delaware, 2012," *Morbidity and Mortality Weekly Report* 61, no. 27 (2012): 501-504, https://www.cdc.gov/mmwr/preview/mmwrhtml/mm6127a1.htm.
- 60. Centers for Disease Control and Prevention, "Protect Patients Against Preventable Harm from Improper Use of Single-Dose/Single-Use Vials," accessed March 20, 2018, https://www.cdc.gov/injectionsafety/cdcposition-singleusevial.html.
- Isaac See et al., "Outbreak of *Tsukamurella* Species Bloodstream Infections Among Patients at an Oncology Clinic—West Virginia, 2011-2012," *Infection Control & Hospital Epidemiology* 35, no. 3 (2014): 300-306, http://dx.doi.org/10.1086/675282.
- 62. The year source was published; information was not available about the timing of the adverse event.
- 63. Eric Schwam, "Severe Accidental Overdose of 4-Aminopyridine due to a Compounding Pharmacy Error," *The Journal of Emergency Medicine* 41, no. 1 (2011): 51–54, doi:10.1016/j. jemermed.2009.04.037.
- 64. The year source was published; information was not available about the timing of adverse events.
- Beth Anne Frost and Marion A. Kainer, "Safe Preparation and Administration of Intravitreal Bevacizumab Injections," *The New England Journal of Medicine* 365, no. 23 (2011): 2238, doi:10.1056/ NEJMc1105759.
- 66. Roger A. Goldberg et al., "An Outbreak of *Streptococcus* Endophthalmitis After Intravitreal Injection of Bevacizumab," *American Journal of Ophthalmology* 153, no. 2 (2012): 204–8.e1, doi:10.1016/j. ajo.2011.11.035.
- 67. Department of Veterans Affairs, Office of Inspector General, "Healthcare Inspection: Oversight Review of Ophthalmology Adverse Drug Events, VA Greater Los Angeles Healthcare System, Los Angeles, California," Report No. 12-01515-151 (2012), http://www.va.gov/oig/pubs/ VAOIG-12-01515-151.pdf.
- Cheryl A. Thompson, "Bacteremia Outbreak Tied to Improper Filtration by Compounding Pharmacy," *American Journal of Health-System Pharmacy* 68, no. 22 (2011): 2110 and 2112, doi:10.2146/ news110075.
- 69. Barbara Vitello, "Lutheran General to Pay \$8.25 Million in Baby's Death," *Daily Herald*, April 5, 2012, http://www.dailyherald.com/article/20120405/news/704059806.
- 70. Arizona State Board of Pharmacy v. Vicki Graves, "Consent Agreement for Civil Penalty and Continuing Education," Board Case No. 10-0061-PHR (May 14, 2010), https://pharmacy.az.gov/sites/default/files/documents/files/10-0061.pdf.
- 71. U.S. Food and Drug Administration, "PharMEDium Services, LLC 483 Report," accessed Dec. 21, 2016.
- 72. North Carolina Board of Pharmacy, "Consent Order: In the Matter of Deep River Drug," accessed Dec. 12, 2016, http://www.ncbop.org/Disciplinary%20Actions%20-%20PHARMACIES/ DeepRiverDrug08944.pdf.
- U.S. Food and Drug Administration, responses for the record following hearing on "Pharmacy Compounding: Implications of the 2012 Meningitis Outbreak," United States Senate Committee on Health Education, Labor and Pensions, May 16, 2013.

- 74. The year source was published; information was not available about the timing of the adverse event.
- 75. David Kanter et al., "Acute Baclofen Withdrawal in a Patient Receiving Compounded Intrathecal Baclofen: A Case Report," Archives of Physical Medicine and Rehabilitation 89 (2008): E123, accessed Dec. 12, 2016, http://www.archives-pmr.org/article/S0003-9993(08)01152-0/pdf.
- North Carolina Board of Pharmacy, "Consent Order of Discipline: In the Matter of Jewel Freeman," accessed Dec. 12, 2016, http://www.ncbop.org/Disciplinary%20Actions%20-%20PHARMACISTS/ FreemanJewel10249.pdf.
- 77. The year source was published; information was not available about the timing of the adverse event.
- Jamison E. Strahan, Joel L. Cohen, and Joe A. Chorny, "Granuloma Annulare as a Complication of Mesotherapy: A Case Report," *Dermatologic Surgery* 34, no. 6 (2008): 836–38, doi:10.1111/j.1524-4725.2008.34156.x.
- 79. The year source was published; information was not available about the timing of the adverse event.
- 80. Karen McCoy, "Compounded Colistimethate as Possible Cause of Fatal Acute Respiratory Distress Syndrome," *The New England Journal of Medicine* 357 (2007): 2310–11, doi:10.1056/NEJMc07171.
- 81. Centers for Disease Control and Prevention, "Deaths From Intravenous Colchicine Resulting From a Compounding Pharmacy Error—Oregon and Washington, 2007," *Morbidity and Mortality Weekly Report* 56, no. 40 (2007): 1050–52, http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5640a3. htm.
- Lisa L. Maragakis et al., "Sphingomonas paucimobilis Bloodstream Infections Associated With Contaminated Intravenous Fentanyl," *Emerging Infectious Diseases* 15, no. 1 (2009): 12–18, doi:10.3201/eid1501.081054.
- 83. U.S. Food and Drug Administration, "PharMEDium Services, LLC 13-Apr-07," accessed Dec. 12, 2016.
- 84. U.S. Food and Drug Administration, "Med-South Pharmacy Inc. 28-Sep-07," accessed Dec. 12, 2016.
- 85. Pharmaceutical Technology editors, "FDA Censures Med-South Pharmacy for CGMP Violations," *PharmTech.com*, Oct. 18, 2007, http://www.pharmtech.com/fda-censures-med-south-pharmacy-cgmp-violations.
- Institute for Safe Medication Practices, Medication Safety Alert, "Failed Check System for Chemotherapy Leads to Pharmacist's No Contest Plea for Involuntary Manslaughter," accessed January 9, 2013, http://www.ismp.org/newsletters/acutecare/articles/20090423.asp.
- Matthew Grissinger, "A Fatal Zinc Overdose in a Neonate: Confusion of Micrograms With Milligrams," *Pharmacy and Therapeutics* 36, no. 7 (2011): 393–94, 409, http://www.ncbi.nlm.nih.gov/ pmc/articles/PMC3171817.
- 88. Reid Paul, "Despite Court Ruling, FDA Still Warning Compounders," *Drug Topics*, Jan. 8, 2007, http:// drugtopics.modernmedicine.com/drug-topics/content/despite-court-ruling-fda-still-warningcompounders.
- ABC News, "Death Prompts Calls for More Drug Scrutiny," April 21, 2005, http://abcnews.go.com/ Primetime/Health/story?id=692826&page=1.
- 90. Rebecca Sunenshine et al., "A Multistate Outbreak of *Serratia marcescens* Bloodstream Infection Associated With Contaminated Intravenous Magnesium Sulfate From a Compounding Pharmacy," *Clinical Infectious Diseases* 45, no. 5 (2007): 527-33, doi:10.1086/520664.

- 91. U.S. Food and Drug Administration, "PharMEDium Services, LLC 13-Apr-07."
- Mark D. Gershman et al., "Multistate Outbreak of *Pseudomonas fluorescens* Bloodstream Infection After Exposure to Contaminated Heparinized Saline Flush Prepared by a Compounding Pharmacy," *Clinical Infectious Diseases* 47, no. 11 (2008): 1372–79, doi:10.1086/592968.
- 93. Rebecca Sunenshine et al., "An Outbreak of Postoperative Gram-Negative Bacterial Endophthalmitis Associated With Contaminated Trypan Blue Ophthalmic Solution," *Clinical Infectious Diseases* 48, no. 11 (2009): 1580–83, doi:10.1086/598938.
- Ami S. Patel et al., "Outbreak of Systemic Inflammatory Response Syndrome Linked to a Compounding Pharmacy - Virginia, 2005" (poster presented at the 55th Annual Epidemic Intelligence Service Conference, 2006), http://www.cdc.gov/eis/downloads/2006.eis.conference. pdf.
- 95. Maryland State Board of Pharmacy, "Order for Summary Suspension: In the Matter of Central Admixture Pharmacy Services Inc.," accessed Jan. 9, 2013, http://www.dhmh.maryland.gov/pharmacy/docs/FormalOrders/C/C.A.P.S%2011-15-05.pdf.
- Melissa R. Held et al., "Life-Threatening Sepsis Caused by *Burkholderia cepacia* From Contaminated Intravenous Flush Solutions Prepared by a Compounding Pharmacy in Another State," *Pediatrics* 118, no. 1 (2006): e212–e215, http://pediatrics.aappublications.org/content/118/1/e212.long.
- 97. Arizona State Board of Pharmacy, "Amended Complaint and Notice of Hearing: In the Matter of Apothecary Shop of Phoenix Inc.," accessed Dec. 22, 2016, https://pharmacy.az.gov/sites/default/files/documents/files/03-0015%20B.pdf.
- 98. Paul, "Despite Court Ruling."
- 99. ABC News, "Death Prompts Calls."
- 100. The year source was published; information was not available about the timing of the adverse event.
- 101. Jeffrey Suchard and Kimberlie Graeme, "Pediatric Clonidine Poisoning as a Result of Pharmacy Compounding Error," *Pediatric Emergency Care* 18, no. 4 (2002): 295–96, http://journals.lww.com/ pec-online/Citation/2002/08000/Pediatric\_clonidine\_poisoning\_as\_a\_result\_of.14.aspx.
- 102. The year source was published; information was not available about the timing of the adverse event.
- 103. Suchard and Graeme, "Pediatric Clonidine Poisoning."
- 104. Nadine Shehab et al., "U.S. Compounding Pharmacy-Related Outbreaks, 2001-2013—Public Health and Patient Safety Lessons Learned," *Journal of Patient Safety* (2015), doi:10.1097/ PTS.00000000000188.
- 105. Centers for Disease Control and Prevention, "Exophiala Infection From Contaminated Injectable Steroids Prepared by a Compounding Pharmacy—United States, July-November 2002," Morbidity and Mortality Weekly Report, 51, no. 49 (2002): 1109–12, http://www.cdc.gov/mmwr/preview/ mmwrhtml/mm5149a1.htm.
- 106. North Carolina Department of Health and Human Services, Division of Public Health, "Exophiala (Wangiella) dermatitidis Fungal Infection Outbreak," Epi Notes 2002-4 (December 2002-February 2003): 4–6, http://epi.publichealth.nc.gov/pdf/en2002-4.pdf.

- 107. David Brown, "Previous Fungal Meningitis Outbreak a Decade Ago Resulted in No Oversight Changes," *The Washington Post*, Nov. 5, 2012, https://www.washingtonpost.com/national/ health-science/previous-fungal-meningitis-outbreak-a-decade-ago-resulted-in-nooversight-changes/2012/11/05/8417d84e-1fa8-11e2-9cd5-b55c38388962\_story.html?utm\_ term=.2ec5b1bfe374.
- 108. Joseph F. Perz et al., "Pseudomonas putida Septicemia in a Special Care Nursery due to Contaminated Flush Solutions Prepared in a Hospital Pharmacy," Journal of Clinical Microbiology 43, no. 10 (2005): 5316–18, doi:10.1128/JCM.43.10.5316-5318.2005.
- 109. The year source was published; information was not available about the timing of the adverse event.
- Michael Romano and Ann Dinh, "A 1,000-Fold Overdose of Clonidine Caused by a Compounding Error in a 5-Year-Old Child With Attention-Deficit/Hyperactivity Disorder," *Pediatrics* 108, no. 2 (2001): 471-72, https://www.ncbi.nlm.nih.gov/pubmed/11483818.

- 111. Rachel Civen et al., "Outbreak of Serratia marcescens Infections Following Injection of Betamethasone Compounded at a Community Pharmacy," *Clinical Infectious Diseases* 43 (2006): 831–37, http://cid. oxfordjournals.org/content/43/7/831.full.pdf+html.
- 112. California Board of Pharmacy, "Decision: In the Matter of the Statement of Issues Against Robert Eugene Horwitz," Oct. 15, 2008.
- 113. Dejana Selenic et al., "Enterobacter cloacae Bloodstream Infections in Pediatric Patients Traced to a Hospital Pharmacy," American Journal of Health-System Pharmacy 60, no. 14 (2003): 1440-46, https://www.ncbi.nlm.nih.gov/pubmed/12892028.

## **For further information, please visit:** pewhealth.org/drugsafety

Contact: Sara Brinda, communications Email: sbrinda@pewtrusts.org Project website: pewhealth.org/drugsafety

The Pew Charitable Trusts is driven by the power of knowledge to solve today's most challenging problems. Pew applies a rigorous, analytical approach to improve public policy, inform the public, and invigorate civic life.